

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,  
MARISSA BLAIR, APRIL MUNIZ, MARCUS  
MARTIN, NATALIE ROMERO, CHELSEA  
ALVARADO, THOMAS BAKER and JOHN  
DOE,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,  
CHRISTOPHER CANTWELL, JAMES  
ALEX FIELDS, JR., VANGUARD  
AMERICA, ANDREW ANGLIN,  
MOONBASE HOLDINGS, LLC, ROBERT  
“AZZMADOR” RAY, NATHAN DAMIGO,  
ELLIOT KLINE a/k/a/ ELI MOSELY,  
IDENTITY EVROPA, MATTHEW  
HEIMBACH, MATTHEW PARROTT a/k/a  
DAVID MATTHEW PARROTT,  
TRADITIONALIST WORKER PARTY,  
MICHAEL HILL, MICHAEL TUBBS, LEAGUE  
OF THE SOUTH, JEFF SCHOEP, NATIONAL  
SOCIALIST MOVEMENT, NATIONALIST  
FRONT, AUGUSTUS SOL INVICTUS,  
FRATERNAL ORDER OF THE ALT-  
KNIGHTS, LOYAL WHITE KNIGHTS OF THE  
KU KLUX KLAN, and EAST COAST  
KNIGHTS OF THE KU KLUX KLAN a/k/a  
EAST COAST KNIGHTS OF THE TRUE  
INVISIBLE EMPIRE,

Defendants.

**Civil Action No. 3: 17-cv-00072-NKM**

**MOTION FOR *PRO HAC VICE* ADMISSION OF JONATHAN R. KAY**

Pursuant to Rule 6(d) of the Local Rules for the United States District Court for the  
Western District of Virginia, I, Robert T. Cahill, an attorney admitted to practice in this Court,

and counsel of record in the instant proceeding, hereby moves the Court for the admission of Jonathan R. Kay, Esq. to appear *pro hac vice* on behalf of the Plaintiffs in the above captioned case and in support thereof state as follows:

1. Mr. Kay is an attorney with Kaplan Hecker & Fink LLP, 350 Fifth Avenue, Suite 7110, New York, NY 10118, Tel: (212) 763-0883, Email: [jkay@kaplanhecker.com](mailto:jkay@kaplanhecker.com).

2. Mr. Kay is qualified and licensed to practice law and is a bar member in good standing in the State of New York (Registration No. 5486188 – Date of Admission: Dec. 22, 2016). He is also a bar member in good standing with the United States District Court for the Southern District of New York (Date of Admission: Nov. 14, 2018), the United States District Court for the Northern District of New York (Date of Admission: Nov. 30, 2018), and the United States District Court for the Eastern District of New York (Date of Admission: Dec. 14, 2018).

3. Mr. Kay agrees to submit to and comply with the appropriate rules of procedure as required in the case for which he is applying to appear *pro hac vice* as well as the rules and standards of professional conduct applicable to all lawyers admitted to practice before this Court.

WHEREFORE, for the reasons stated above, it is requested that this Court grant this motion and permit Jonathan R. Kay, Esq. to appear *pro hac vice* on behalf of Plaintiffs in the above captioned case, and to appear at hearings or trials in the absence of an associated member of the bar of this Court.

Dated: April 8, 2020

Respectfully submitted,

/s/ Robert T. Cahill

Robert T. Cahill (VSB 38562)

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*Counsel for Plaintiffs*

### CERTIFICATE OF SERVICE

I hereby certify that on April 8, 2020, I filed the foregoing with the Clerk of Court through the CM/ECF system, which will send a notice of electronic filing to:

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I further hereby certify that on April 8, 2020, I also served the following non-ECF participants, via electronic mail, as follows:

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s/ Robert T. Cahill

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